1R - 187

GENERAL CORRESPONDENCE

YEAR(S): 1998 - 2002

Price, Wayne

From:

Price, Wayne

Sent: To: Tuesday, May 21, 2002 9:16 AM 'whearth@iamerica.net'; Price, Wayne

Cc:

Kent Weissling

Subject:

RE: Ocean Carlisle Monitor Well Plugging Report

Approved!

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----Original Message----

From: Mike Griffin [mailto:whearth@iamerica.net]

Sent: Tuesday, May 21, 2002 8:49 AM

To: Wayne Price Cc: Kent Weissling

Subject: Ocean Carlisle Monitor Well Plugging Report

Wayne:

In accordance with your May 10th e-mail request, attached, please find a copy of the Plugging Report for the three monitor wells located at the UMC / Ocean Energy Lovington blowout site.

Thank you again for all of your assistance throughout this project.

Mike Griffin

Tracking:

Recipient

Read

'whearth@iamerica.net'

Price, Wayne

Read: 5/21/2002 9:16 AM

Kent Weissling

ATKINS ENGINEERING A SSOCIATES INC.

May 20, 2002

Mike Griffin 19606 San Gabrial Houston, Texas 77084

RE: Ocean Energy Carlisle St. Com 1-Y

Dear Mr. Griffin:

On May 18, 2002, Atkins Engineering Associates, Inc. plugged 3 monitor wells on the Ocean Energy Carlisle St. Com 1-Y west of Lovington, New Mexico.

The 2 inch casings had previously been grouted in place, therefore no removal of casing was possible without collapse of the holes.

The work was accomplished on all 3 wells as follows:

1. Each monitor well total depth was measured as below:

MW-1 - 62 feet

MW-2 - 62 feet

MW-3 - 62 feet

- A cement slurry of 15 lbs/gal. was pumped down each hole to flow through the screen and plug the screen and casing.
- 3. Well heads were removed to below land surface.
- 4. Cement grout was applied to each well head to fill to land surface.

Sincerely,

Jackie D. Atkins, PE, PS, ES

JDA/bam

(505) 624-2420 FAX: (505) 624-242) coca@dfn.com 2904 West Second Street Post Office Box 3156 Roswell, New Mexico 88202-3456

April 25, 2000

CERTIFIED MAIL RETURN RECEIPT NO. 5051 4713

Mr. Kent Weissling Ocean Energy Inc. 1001 Fannin Suite 1600 Houston, Texas 77002

Re: Closure Report UMC Carlisle State Com #1

Dear Mr. Weissling:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Ocean Energy Inc.'s closure report dated November 08, 1999 and addendum dated December 14, 1999 submitted by Whole Earth Environmental. The NMOCD has spent many hours reviewing the final closure reports and for reasons stated below the NMOCD cannot grant closure at this time.

1. The closure report did not give the final bottom hole soil analytical results for the West Emergency Pit below the liner and the report reflected the presence of benzene at .019 mg/l in the West Emergency Pit monitor well which exceeds the New Mexico Ground Water Standards for benzene of .010 mg/l.

The NMOCD requires Ocean Energy Inc. to sample all the on-site monitor wells including the nearby windmill and analyze for volatile organics EPA method 8260C, semi-volatile organics EPA method 8270B including 1 and 2-methynaphthalene, WQCC Metals by ICAP method 6010/(ICPMS) and Major Cations/Anions general chemistry from 40 CFR 136.3. The NMOCD requires Ocean Energy Inc. to make arrangements with the NMOCD Environmental Bureau in order that OCD may split samples.

- 2. The bottom hole soil sample analytical results from the East Emergency Pit was shown on the side profile drawing to be greater than 50 mg/kg for BTEX and 42,518 mg/kg for TPH. This exceeded the levels of the previously approved plan. Therefore, Ocean Energy Inc. will be required to submit for NMOCD approval a long term plan to monitor the site.
- 3. The closure report indicated the south mixing zone has chlorides remaining in the soil at 19,852 mg/kg. Please submit for NMOCD approval a plan that addresses this issue.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.

Environmental Bureau

cc: OCD Hobbs Office NMSLO-Santa Fe

April 25, 2000

CERTIFIED MAIL RETURN RECEIPT NO. 5051 4713

Mr. Kent Weissling Ocean Energy Inc. 1001 Fannin Suite 1600 Houston, Texas 77002

Re: Emergency Response Manual and Training

Dear Mr. Weissling:

As a result of the UMC Carlisle State Com #1 gas well blow-out near Lovington, New Mexico in March of 1998 the New Mexico Oil Conservation Division and UMC agreed that UMC would develop an emergency response manual and provide training on this issue. Pursuant to our telephone conversation yesterday I understand the manual is to be completed within 30 days.

The OCD is requesting that Ocean Energy Inc. began preparing for the training session. We would like to tentatively set-up the event in Hobbs, New Mexico sometime in July of this year. At your earliest opportunity would you please send a draft outline so we may review it and provide comments.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.

Environmental Bureau

Wayne Price

cc: OCD Hobbs Office

August 2, 1999

CERTIFIED MAIL RETURN RECEIPT NO. Z 357 870 126

Mr. Scott M. Webb Regulatory Coordinator Ocean Energy 410 17 th Street, Suite 1400 Denver, Colorado 80202 Fax # 303-534-8918

Re: Closure Report Addendums

UMC Carlisle State Com #1

Pit Remediation Projects and Original Site Clean-up.

UL K-Sec 10-Ts16s-R35e

Dear Mr. Webb:

New Mexico Oil Conservation Division (NMOCD) is in receipt of Ocean Energy's (EC) March 11, 1999 closure report addendums submitted as two parts, one (A) UMC Carlisle State Com#1 Pit Remediation Project prepared by Whole Earth Environmental, and two (B) Landfarm/Soil Storage Areas & Peripheral Over Spray Area including information for the Halliburton South, North and East Flare Pits prepared by Callaway Safety Equipment Co., Inc. In order for the NMOCD to complete an evaluation of this closure request Ocean Energy shall supply the following information as required below:

A. Whole Earth Submittal:

- 1. Please provide dimensional vertical side profile drawings for the West Emergency Pit, West Reserve Pit, East Emergency Pit, and East Reserve Pit. Each drawing shall contain the following information:
 - a. Final soil isoconcentration values for BTEX, TPH, Chloride and any other analytical results taken (i.e. EC, CEC, SAR, ESP, etc) of the bottom, side walls, and compacted soils below the liners, each successive fill lift of the remediated soils, any unremediated or remaining contaminated soils (i.e. drilling muds, etc.), and top soils. Please include dimensions and any significate features such as monitor wells, groundwater, liners, etc.

- b. Each analytical concentration value shown on the drawing shall be identified and listed in a summary table (i.e. Laboratory Confirmation Testing Index) and cross-referenced to laboratory or field reports. If these values are averaged then list the high and low values obtained. Please include all field or laboratory reports, Chain-of-Custody forms, etc. in an appendix to support values shown on the drawings.
- 2. OE shall identify and locate the approximate center of each pit by a licensed surveyor and include this on a site plot plan(s).
- 3. Please identify and provide dimensional plot plans and vertical profile drawings for all general areas that were used as treatment zones for mixing and blending. Each drawing shall contain the following information:
 - a. Final soil isoconcentration values for BTEX, TPH, Chloride and any other analytical results (i.e. EC, CEC, SAR, ESP, etc) for all areas that were used for treatment zones.
 - b. Each analytical concentration value shown on the drawing shall be identified and listed in a summary table (i.e. Laboratory Confirmation Testing Index) and cross-referenced to laboratory or field reports. If these values are averaged then list the high and low values obtained. Please include all field or laboratory reports, Chain-of-Custody forms, etc. in an appendix to support values shown on the drawings.
 - c. All treatment zone areas shall have at least one sample taken three feet below the center of the treatment zone area for background purposes. These analysis shall include BTEX (8020), TPH (418.1 or 8015 GRO&DRO) and EPA general chemistry.
 - d. The center of each location shall be referenced to a known surveyed point.
- 4. Please provide a groundwater potentiometric surface map (i.e. contours) showing the groundwater flow direction and hydraulic gradient in ft/ft to the nearest .001 ft., a table of the elevations for the monitor wells and groundwater depths to the nearest .01ft.
- 5. Photos submitted in the October 22, 1998 report were not dated. Please provide and/or resubmit photos which include dates.
- 6. The NMOCD approved QP-47A "Remediation Protocol" with conditions on July 30, 1998. This Remediation Protocol has been revised three different times with the current revision being QP-47D. These revisions have made significant changes without NMOCD approval.
 - a. It appears that QP-47 D item 9.0 "West Emergency Pit Preliminary Compaction" allows contaminated material to be placed under the liner of the West Emergency pit

that exceeds the values of NMOCD approval letter conditions dated July 30, 1999.

- b. It appears there were changes in the modeling criteria, i.e. salt is modeled at 500 ppm in the closure report, but was modeled at 3000 ppm in the QP-47 A, it also appears there were changes in the final clean-up standards, how certain pits were closed, and the final site restoration.
- c. The Closure Report Volume I Executive Summary Plat Map is nicely prepared but the overlay indicates that the East Reserve Pit contents were placed in the East mix area which is in conflict with the QP-47 D item. 11. Protocol (Reserve Pit Remediation) which indicates the pit was closed pursuant to NMOCD Rule 105.A.

Please provide a detail description and the reasons for all changes made from QP-47A to D and up-date all associated drawings to reflect the final changes.

7. The NMOCD's file indicates that on April 28, 1998 Ocean Energy applied for permission on form C-103 to install a liner over the existing drilling reserve pit and committed to removing the contents along with the original contents after completion of the well. The final report reveals there were actually two drilling pits, one called West Reserve Pit and the other East Reserve Pit. Please provide a detailed written description and chronology of all events related to these pits and the final disposition of the contents of the drilling pits in question.

It appears that one of the reserve pits was buried over existing contamination and that blasting had occurred in close proximity, thus causing concern that remaining buried contaminants might infiltrate into the shallow groundwater over time. Also there was no information provided as to the type of liner installed or the mechanical integrity of the liner.

- 8. The groundwater quality monitoring is incomplete. Groundwater was not analyzed for general chemistry anions or the complete New Mexico Water Quality Control Commission (WQCC) water contaminants. Please provide an initial round of sampling for each monitoring well to include analyzing for the complete New Mexico Water Quality Control Commission (WQCC) regulation water contaminants utilizing EPA approved methods, thereafter Ocean Energy may propose analyzing for constituents of concern.
- 9. The BTEX values taken from soil samples 14927-14933 collected during the vertical extent drilling event in the East Emergency Pit bottom exceed WQCC groundwater standards. 8015 GRO & DRO values were provided. It is NMOCD's understanding that the liner was installed over this area thus leaving elevated contamination under the liner. There was no drilling log provided in the report. Please address this issue.
- 10. Soil samples 15326-15329 for the East Emergency pit appeared to have been collected without preservation and therefore might not be valid. **Please explain?**

- 11. Soil sample 15249 West Reserve Pit Bottom was not analyzed for chlorides. This was required as a condition of approval in the original NMOCD approval letter dated April 18, 1998, see item 1. Attachment. **Please provide!**
- 12. Soil sample 15248 "Spread Composite" is not identified. Please explain what this represents?
- 13. The final report contains analytical results from Cardinal laboratory which are not identified in the report. Please explain what these analytical results represent and where were they taken?
- 14. The July 28, 1998 (7/28/98) chronology indicates that east pit south wall soil sample # 14936 was collected for retesting due to the first samples exceeding the closure protocols. The analytical results provided is for water not soil. Please provide the correct analysis for these samples.
- 15. NMOCD is in receipt of Whole Earth Environmental, Inc.'s letter dated June 16, 1999 with analytical attachment. Please note there is no way to identify which monitor wells these samples were taken from or how the wells were purged. Was this sampling event witnessed by NMOCD? Please explain and correct!

B. Callaway Safety Equipment Co., Inc.:

- 1. Item B.5. from NMOCD letter dated November 24, 1998 requested background levels be established and vertical extent be preformed in the pits for chlorides? Ocean Energy has failed to perform this request! Please provide.
- 2. Please identify and provide dimensional plot plans and vertical profile drawings for all general areas that were used as Landfarm/Soil Storage zones. Each drawing shall contain the following information:
 - a. Final soil isoconcentration surface values for BTEX, TPH, Chloride and any other analytical results (i.e. EC, CEC, SAR, ESP, etc) for all areas that were used for Landfarm/Soil Storage zones.
 - b. Each analytical concentration value shown on the drawing shall be identified and listed in a summary table (i.e. Laboratory Confirmation Testing Index) and cross-referenced to laboratory or field reports. If these values are averaged then list the high and low values obtained. Please include all field or laboratory reports, Chain-of-Custody forms, etc. in an appendix to support values shown on the drawings.

- c. The center of each location in referenced to a known surveyed point.
- d. Ocean Energy shall incorporate the treatment zone monitoring into these drawings.
- 3. NMOCD acknowledges receipt of the Over spray area Peripheral Survey and defers comment at this time.

Ocean Energy shall notify the OCD Santa Fe office and the OCD District office at least 48 hours in advance of all scheduled sampling activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

Please provide all of the above information requested to the NMOCD by September 24, 1999. If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.

Environmental Bureau

cc: OCD Hobbs District office

NM State Land Office-Santa Fe, NM



Whole Earth Environmental, Inc.

19606 San Gabriel, Houston, Texas 77084 281/492-7077 • Fax: 281/646-8996

JN 93

June 16, 1999

New Mexico Oil Conservation Division 2040 S. Pacheco Sante Fe, NM 87505

Attn: Bill Olson

Enclosed, please find a copy of the third quarter testing results of the three monitoring wells adjacent to the Ocean Energy Lovington remediation project.

We plan to do a final sampling round in September and will pass the results promptly to you.

Warmest regards,

Mike Griffin

President

Whole Earth Environmental, Inc.

cc: Scott Webb / Ocean Energy



"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL ATTN: MR. MIKE GRIFFIN 19606 SAN GABRIEL HOUSTON, TEXAS 77084 FAX: 1-281-646-8996

Receiving Date: 06/08/99 Sample Type: Water Project Name: None Given Project #: Ocean Lovington Project Location: None Given Analysis Date: 06/08/99 Sampling Date: 06/08/99 Sample Condition: Iced/Intact

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m.p-XYLENE mg/L	o-XYLENE mg/L	····
18299 18300 18301	0-1 0-2 0-3	<0.001 <0.001 <0.001	<0.001 <0.001 <0.001	<0.001 <0.001 <0.001	<0.001 <0.001 <0.001	<0.001 <0.001 <0.001	
%	IA EA _ANK	93 97 <0.001	89 94 <0.001	90 92 <0.001	88 91 <0.001	89 91 <0.001	

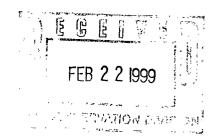
METHODS: SW 846-8020,5030

RolandkJul



February 17, 1999

Wayne Price
State of New Mexico, Energy, Minerals &
Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505



RE:

Carlisle State Com #1 Closure Report

Dear Wayne;

Ocean Energy, Inc is requesting an extension of time to provide the Commission with the information outlined in your letter dated November 28, 1998. As per our telephone conversation on February 16, 1999, we are requesting an extension of 30 days to March 16, 1999. The weather has not been ideal for the gathering of the requested samples up to this date. The field personnel have been concerned that obtaining samples under these conditions would be detrimental to the actual analysis of the samples.

If you have any questions, I can be reached at (303) 573-4721. Thank you for your time and help in this matter.

Sincerely,

Scott M. Webb

Regulatory Coordinator

LM.

Certified Mail: P 288 259 089 Return Receipt Requested

November 24, 1998

Mr. Scott M. Webb Regulatory Coordinator Ocean Energy 410 17 th Street, Suite 1400 Denver, Colorado 80202 Fax # 303-534-8918

Re:

UMC Carlisle State Com #1

Pit Remediation Projects and Original Site Clean-up.

UL K-Sec 10-Ts16s-R35e

Dear Mr. Webb:

New Mexico Oil Conservation Division (NMOCD) is in receipt of the (A); UMC Carlisle State Com#1 Pit Remediation Project Closure Report Volume I and II dated October 22, 1998 prepared by Whole Earth Environmental and is in receipt of the (B); Final Remedial Action Reports dated July 17,1998 and the Addendums prepared by Callaway Safety Co. Inc. for the Halliburton South, North and East Flare Pits submitted by Ocean Energy dated November 2, 1998. The NMOCD has the following comments and request concerning the two submittals.

- A. In order to assist NMOCD in the review process we are requesting the following information:
 - 1. Please provide tables that will cross reference the final lab analytical report(s) numbers, results, sample locations, depths, and times, etc. A two or three dimension drawing(s) with overlays would be helpful showing the vertical cross section in layers including the position of the liner relative to groundwater and top surface features for each pit or remediation area.
 - 2. Please provide a section in the report to address the groundwater investigation. It should include discussions on the groundwater sampling and analyses and should address the following:
 - A. A site map depicting the locations of the monitor wells, windmills, etc.
 - B. A potentiometric surface map showing the groundwater depth contours. Surveyed data reference point and surveyed monitor wells. A table of elevations for the monitor wells and groundwater depths to the nearest .01ft. Groundwater flow directions and hydraulic gradient in ft/ft to the nearest .001
 - C. Table of groundwater results cross referencing the lab reports, locations, times, etc.
 - D. Sub-section containing all Soil Boring Logs and Monitor Well construction diagrams.
 - 3. Please provide a Table of Site Chronology of significate events.



- B. Please provide the following information for the three sites closed by Callaway Safety Co.
 - l. Under the 2.2 Legal Description sections, please provide a unit letter or footage.
 - On the OCD pit closure forms please be more specific as to where the reference point 2. (wellhead) is actually located or reference the report.
 - 3. The pit closure reports show bottom hole results but do not include side wall information. Please provide to demonstrate horizontal extent or provide rational.
 - 4. Attachment C in each report is titled "Ground Water Data Original Laboratory Reports", but the analysis included is for soils, please explain.
 - 5. It appears the vertical extent for hydrocarbons in all three pits have been defined. however the chlorides appear to be elevated. Please demonstrate what the background levels of chlorides would be outside of the impact areas and please investigate the vertical extent for chlorides.
 - Please explain the results for the chlorides 11,300 (mg/kg) found in the North Pit 6. Report lab results sampling date 04/29/98 lab # H3615-1 S42998HSP.
 - 7. Please provide a Table of Site Chronology of significate events.

Please be advised Ocean Energy is required to fulfill the original requirements of the approval letter issued to Mr. Scott Webb on April 18, 1998. The following items have not been addressed as of this date:

- Under item 2. the large over spray area has not been addressed. Please provide this 1. information.
- Under item 3. Off-site disposal, please provide. 2.
- Under Item 4. all areas where soils were stocked piled or temporary land farmed shall be 3. tested, please provide.
- 4. Under item 5. records of product sells and/or disposal during the blow-out event.

Please provide all of the above information on or before February 15, 1999. OCD may grant additional time for a good cause show. If you require any further information or assistance please do not hesitate to call (505-827-7155) or write this office.

Sincerely Yours,

Wayne Price-Environmental Bureau

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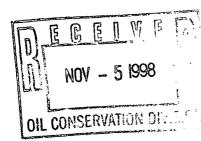
Chris Williams-NMOCD District I Supervisor CC: NM State Land Office-Santa Fe, NM

File: O:wp/oeumc2



November 2, 1998

Chris Williams State of New Mexico, Energy, Minerals & Natural Resources Department Oil Conservation Division P.O. Box 1980 Hobbs, New Mexico 88240



RE:

Carlisle State Com #1 Lea County, New Mexico

Halliburton and East Flare Pit Closures

Final Report

Dear Mr. Williams;

On behalf of Ocean Energy, Inc., Calloway Safety Equipment Co., Inc. submitted a final closure report on July 17, 1998 and an addendum's on October 22, 1998 for the subject pits.

If you have any questions, I can be reached at (303) 573-4721. Thank you for your assistance throughout the entire remedial process of this location.

Sincerely,

Scott M. Webb

Regulatory Coordinator

CC: Wayne Price



October 22, 1998

Mr. Wayne Price, Environmental Bureau State of New Mexico, Energy, Minerals & Natural Resources Department Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87504

RE:

Carlisle State Com Lease, Well #1

Closure Report

Dear Mr. Price;

Enclosed for your review and comment is the closure report for the subject lease and well. If you have any questions please call me in the Denver office at (303) 573-4721. Thank you for your time and help with all stages of this remediation project.

Scott M. Webb
Regulatory Coordinator

CLOSURE, REPORTS ARE

COVER-THIS FILE.

3311 North Grimes Hobbs, New Mexico 88240 Telephone (505) 392-0659 FAX (505) 392-4547 e-Mail callsafe@gte.net

Callaway Safety Equipment Co., Inc.

October 22, 1998

Mr. Chris Williams
New Mexico Department of Energy, Mineral, and Natural Resources
Oil Conservation Division, Hobbs Field Office
P.O. Box 1980
1000 West Broadway
Hobbs, New Mexico 88240

Subject: Final Remediation Action Report Addenda for the unlined pits associated with the UMC/Ocean Energy Carlisle State Com #1, i.e.,

"Halliburton South Pit"
"Halliburton North Pit"
"East Flare Pit"

Mr. Williams,

UMC/Ocean Energy has contracted with Callaway Safety Equipment Company, Inc. (CSE) to provide environmental services at the above referenced well location. Enclosed, please find; duplicate copies of the "Final Remediation Action Report Addendum" for each of the above referenced unlined pits. The original reports were submitted prior to backfilling and did not contain the requisite information. Based on information provided in these addenda and the respective final remedial action reports, we request final closure approval for these remediated pits.

Your response may be directed to Mr. Scott Webb, UMC/Ocean Energy or CSE. I may be reached at 392-0659 if there are any questions. Thank you for your assistance.

Sincerely.

Pat McCasland

CSE SAFETY AND ENVIRONMENTAL DIRECTOR

CC: WAYNE PRICE, NMOCD
SCOTT WEBB, OCEAN ENERGY, DENVER, COLORADO

P. O. B. 1980 Hobbs, NM 88241-1980 Energy Minerals and Na	atural Resources Department Originated 2/13/9
District II - (505) 748-1283 Oil Conser	wation Division h Pacheco Street wation Division h Pacheco Street wation Division Appropriate District Wation Appropriate District Wation Wation Appropriate District Wation Watio
Artesia, NM 88210	h Pacheco Street Submit 2 copies to
1000 Rio Brazos Road Williams and Supremental Santa Fe, No.	827-7131 State to JATOV Landings 2 35 Office in accordance
Aztec, NM 87410 District IV - (505) 827-7131	Revice 87505 paid to JARCV Landings and Office in accordance 827-7131 and and to suppression and diese scale with Rule 116 of back side of form
Release Notification	on and Corrective Action
	PERATOR I DAMP BY 2 Initial Report OF Final Report
Name MM Confetuate Guara Corposition	The state of the s
410-17 Th St., STE 1400	Telephone No. (303) 573-4721
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By Whom?	Date and Hour
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Diameter of 100 Affected	Aved (+-) 4 Acres.
	The state of the s
I hereby certify that the information given above is true and complete to the best of my knot are required to report and/or file certain release notifications and perform corrective actions a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of licontamination that pose a threat to ground water, surface water, human health or the environment.	for releases which may endanger public health or the environment. The acceptance of isbility should their operations have failed to adequately investigate and remediate
operator of responsibility for compliance with any other federal, state, or local laws and	or regulations.
Signature: Start w. W.	OIL CONSERVATION DIVISION WAYNE PRICE- ENUN ENSI.
Printed Name: Scott m. Webb	Approved by District Supervisor:
Title: Regulatory Loov dinator	Approval Date: 8/01/98 Expiration Date: OFFU
Date: 3/26/98 Phone: (303) 573-4721	Conditions of Approval: 15 Attached
	BE RIMC ENURINATION



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION DISTRICT | HOBBS PO BOX 1980, Hobbs, NM 88241 (505) 393-6161 FAX (505) 393-0720

Jennifer A. Salisbury CABINET SECRETARY

July 30, 1998

Mr. Scott M. Webb Regulatory Coordinator Ocean Energy 410 17 th Street, Suite 1400 Denver, Colorado 80202 Fax # 303-534-8918

Re:

UMC Carlisle State Com #1

Pit Remediation Projects and Original Site Clean-up.

UL K-Sec 10-Ts16s-R35e

Dear Mr. Webb:

New Mexico Oil Conservation Division (NMOCD) is in receipt of the Pit Remediation Protocol addendum (QP-47 Rev. A) submitted by Whole Earth Environmental. Please note this plan is hereby approved as is including other aspects that were addressed in the first submittal dated July 6, 1998 and subject to the following additions and conditions:

- 1. Monitor well construction shall be constructed with a minimum of 15 fect of well screen, 10 feet in the water and five feet above. The well shall be appropriately filled with a suitable sand & gravel pack 2 feet above the screen. A bentonite plug properly hydrated shall be set at this point and the well shall be grouted to the surface with cement and 1-3 % bentonite grout. A suitable base shall be constructed for protection. The wells shall be properly developed and purged before sampling. All bore holes must be plugged and abandoned by filling from bottom to top with cement & 1-3% bentonite grout. Any monitor well closure must be approved by NMOCD.
- Ocean Energy shall provide the results of all sampling events upon request and/or closure. All sampling and testing shall be
 pursuant to EPA/ NMOCD standard acceptable protocols. The NMOCD requires the right to request additional sampling
 points, sampling events, and various WQCC chemical constituents upon request.
- 3. Please be advised that NMOCD approval of this plan does not relieve Ocean Energy, Inc. of liability should their operations fail to adequately investigate, remediate, or contain contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD District I approval does not relieve Ocean Energy, Inc. of responsibility for compliance with any other federal, state, or local laws and/or regulations including any additional requirements imposed by the NMOCD Environmental Bureau.
- 4. Please note if Groundwater is determined to be impacted you must notify the NMOCD Environmental Bureau and this office within 24 hours of discovery and written notification pursuant to NMOCD rule 116.
- 5. Ocean Engery/UMC is still responsible for the original submittal dated April 15, 1998 and NMOCD approval requirements dated April 18, 1998.

6. Pursuant to telephone conversation with Mr. Mike Griffin of Whole Earth Environmental, Ocean Energy has modified its plan for all soils used for backfill under the synthetic liners to be less or equal to the following limits; Total BTEX = 10 ppm or less, TPH = 100 ppm or less, and Chlorides = 1000ppm, EC=6 or less. Also Ocean Energy will modify its modeling program to an infiltration rate of 1x10-6 ft/day rather than 1x10-7 ft/day. This more closely represents a synthetic liner per Mr. Griffin.

The NMOCD is currently reviewing the closures submitted by Callaway Safety for the original submittal and will have comments to you in the near future. If you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,

Wayne Price-Environmental Engineer

cc: Chris Williams-NMOCD District I Supervisor
Bill Olson-Environmental Bureau, Santa Fe, NM
Mike Griffin-Whole Earth Environmental

file: wp98/oeumc1

CALLAWAY SAFETY EQUIPMENT CO., INC.

3311 NORTH GRIMES ••• HOBBS, NEW MEXICO 88240
TELEPHONE: (505) 392-0659 • FAX: (505) 392-4547 • E-MAIL: CALL-SAFE@GTE.NET

July 17, 1998

Mr. Chris Williams
New Mexico Department of Energy, Mineral, and Natural Resources
Oil Conservation Division, Hobbs Field Office
P.O. Box 1980
1000 West Broadway
Hobbs, New Mexico 88240

Subject:

Final Remediation Action Reports for the unlined pits associated with the

UMC/Ocean Energy Carlisle State Com #1, i.e.,

"Halliburton South Pit"
"Halliburton North Pit"
"East Flare Pit"

Mr. Williams,

UMC has contracted with Callaway Safety Equipment Company, Inc. (CSE) to provide environmental services at the above referenced well location. Enclosed, please find two copies each of the Final Remediation Action Reports for the above referenced unlined pits, as well as, the completed NMOCD Pit Remediation and Closure Report forms. These reports contain information and conclusions regarding the remediation process implemented according to the previously NMOCD approved Site Assessment Work Plan for the Carlisle State Com #1. Based on these reports, we request final closure approval for these remediated pits. Upon approval, these pits will be decommissioned, i.e., backfilled and contoured in accordance with the Site Assessment Work Plan.

Your response may be directed to UMC/Ocean Energy or CSE. I may be reached at 392-0659 if there are any questions. Thank you for your assistance.

Sincerely,

Pat McCasland

CSE SAFETY AND ENVIRONMENTAL DIRECTOR

CC:

WAYNE PRICE, NMOCD & SCOTT WEBB, UMC DENVER





NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION DISTRICT I HOBBS PO BOX 1980, Hobbs, NM 88241 (505) 393-6161 FAX (505) 393-0720

Jennifer A. Salisbury

July 17, 1998

Mr. Scott M. Webb Regulatory Coordinator Ocean Energy 410 17 th Street, Suite 1400 Denver, Colorado 80202 Fax # 303-534-8918

Re:

UMC Carlisle State Com #1

Pit Remediation Project Site Survey

Dear Mr. Webb:

New Mexico Oil Conservation Division (NMOCD) is in receipt of your letter dated July 6, 1998 and the above referenced report. Please note in order for the NMOCD to properly evaluate this proposal please have your Environmental Contractor be present for a meeting to be held in the Hobbs NM OCD office on Tuesday July 21, 1998 at approximately 10 am in the morning.

The NMOCD will be asking questions concerning the following topics:

- 1. Monitor well construction, well development procedures, purging procedures, and sampling procedures.
- 2. Final bottom hole soil sampling by third party labs.
- 3. Modeling Questions. Please bring hardware and software to demonstrate VADSAT program. Please be prepared to answer question concerning selection of criteria parameters.
- Please be prepared to answer questions concerning the progress of the first work plan submitted and the NMOCD requirements.

Please note the NMOCD request this meeting in order to expedite your project. The NMOCD is giving Ocean Energy verbal approval to continue this project pursuant to the revised plan referenced above, however NMOCD reserves the right to rescind this approval if certain key issues required by NMOCD are not addressed in a timely fashion.

Please be advised that NMOCD approval of this plan does not relieve Ocean Energy, Inc. of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD District I approval does not relieve Ocean Energy, Inc. of responsibility for compliance with any other federal, state, or local laws and/or regulations including any additional requirements imposed by the NMOCD Environmental Bureau.

Please note if Groundwater is determined to be impacted you must notify the NMOCD Environmental Bureau and this office within 24 hours of discovery and written notification pursuant to NMOCD rule 19.

If you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,

Wayne Price-Environmental Engineer

cc: Chris Williams-NMOCD District I Supervisor

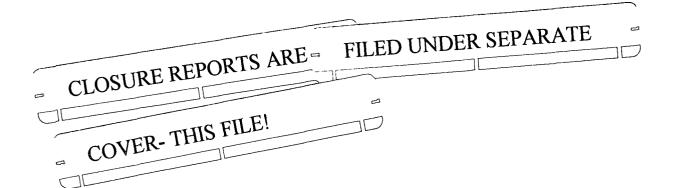
Bill Olson-Environmental Bureau, Santa Fe, NM

Mike Griffin-Whole Earth Envr. Fax# 281-646-8996

File: wp98/oeumc

UMC CARLISLE STATE COM#1 PIT REMEDIATION PROJECT SITE SURVEY

DATED JULY 6, 1998 IN COVER LETTER ENCLOSED IN REPORT.



OIL CONSERVATION DIVISION DISTRICT ! Hobbs PO BOX 1980 Hobbs, NM 88241-1981 (505) 393-6181

Jennifer A. Salisbury

May 29, 1998

Mr. Scott M. Webb Regulatory Coordinator UMC Petroleum Corporation 17th Street 410 Bldg. Suite 1400 Denver, Colorado 80202

Re: Site Assessment Work Plan for the UMC Petroleum Corporation well: Carlisle State Com #1. Located in UL K Sec 10-Ts16s-R35e. Submitted by Callaway Safety Equipment Co., Inc. (CSE).

Dear Mr. Webb:

To clarify your questions concerning item #'s 1&3 and the contents of the existing drilling pits, the NMOCD is requiring UMC to dispose of this material off-site at an approved NMOCD facility. This pit had lost is mechanical integrity during the blowout and the fact this pit is highly contaminated with both salts and hydrocarbons the NMOCD cannot allow you to bury this waste.

Please note this area is overlying a major fresh water aquifer that supplies drinking water to the city of Lovington, NM. The NMOCD has the authority to require this type of clean-up to protect public health, groundwater, and the environment. We obtain this authority from the NM Oil & Gas Act and the NM Water Quality Act.

If you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,

Wayne Price-Environmental Engineer

cc: Chris Williams-NMOCD District I Supervisor

Roger Anderson-Environmental Bureau Chief, Santa Fe, NM

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E - Indicates some form of enforcement action taken in the field (show immediately below the letter U. R or O)

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Date

: APR-29 07:34

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Start time

: APR-29 07:34

End time

: APR-29 07:35

Pages sent

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*** SEND SUCCESSFUL ***

Buttachia Calenti Enghai ONSERVATION DIVISION 10 Old Sens Pe Trail, Room 205 Sagn Pa, New Maxico 87503 30-025-34279 STATE OF Carlisle State Com ******* D STE 1400, Denver, 165 10 GL 3998 NOTICE OF INTENTION TO: SUBSECUENT REP 图 UMC is requesting to line the existing drilling reserve pit to use for circulation to complete the well. The original pit contents are dayed we would like to install liner over old pit and seal, build up the berm and utilize. Contents of this pit will be dried out and removed with drilling pit contents. after the well has been completed. with the sold sine 8001 NYA (303) 573-4721 Scott M. Wabb 4/22/78

APR 28 '98 04:42PM	OCEAN ENERGY				P.2/	2
Submit 3 Copies to Appropriate Dianat Cilles	State of N Energy, Minerals and Nat				Perm C Botted	
DISTRICT P.O. Box 1980, Robbs, NM 88240	OIL CONSERVATION DIVISION 310 Old Senta Pe Trail, Room 206 Santa Pe, New Mexico 87503			WELL AM NO.	30-025-34279	
DISTRICT II P.O. Drawa DD, Asseila, NM 88210				S. Indicate Type		re 🔾
DISTRICT HI 1000 Rio Bruss Rd., Ames, PM 87410				6. Same OS & C		
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1. Type of Well:		بسته مارد		Carlisle	State Com	
2. Name of Operator UMC Petroleum Corpora				2. Well No.	1	
1 Addres of Openior 410 17th St., STE 140	0, Denver, CO 8020	2		9. Ped same of Morrow	Wilden	
Well Location Unit Lotter _K : 165	0 South		1980	Post Pro	West	Une
Section 10	Township 16S		35E	NAPM	Lea	County
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12. Decode Proposed or Completed Open work) SEE RULE 1103.	·					
UMC is requesting to l circulation to complet We would like to instant and utilize. Contents drilling pit contents,	e the well. The or	igir	al pit contents	are dryed	out.	Supplied to the supplied to th
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TYPE OR PRINT MANG	Scott M. Webb	TELEVIZAS NO.	(303) 573-4721	
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CONDITIONS OF AFTHOVAL PART.

UMC PETROLEUM CORPORATION, DENVER DIVISION

410 17TH STREET, SUITE 1400 DENVER, COLORADO 80202 (303) 573-5100 FAX (303) 572-3034

FAX

Pages (2 including cover)

Date:

4/28/98

To:

Chris Williams/Gary Wink NM OCD FAX (505) 393-0720

From:

Scott Webb / Operations Department (303) 573-4721 FAX (303) 534-8918

Message:

Carlisle State Com #1

Chris,

I sent originals in the mail. They have set a liner in the pit but are not using it (the pit) yet. Could we get a verbal approval?

Thanks

Scott Webb

<u> District 1</u> - (505) 393-6161 O. Box 1980 lobbs, NM 88241-1980 111 S. First Utesia, NM 88210 000 Rio Brazos Road \zues, MM 87410 <u>Natrict IV</u> . (505) 827-7131

New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division

2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

Subn to: Die

Forn

Origin.

Environa accenticament

APR 23 1998

1. RCRA Exempt: 🔲 Non-Exempt: 🔘 🥂 📈	4. Generator UMC
Verbal Approval Received: Yes 💢 No 🔲	5. Originating Site Cargile #
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Sonny's
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) Les Count	y UMC Carglie #1
All requests for approval to accept oilfield exempt wasted. Generator; one certificate per job. All requests for approval to accept non-exempt wastes PROVE the material is not-hazardous and the Generato listing or testing will be approved. All representations are only the wester delivered are only the	must be accompanied by necessary chemical r's certification of origin. No waste classified ha
Generator; one certificate per job. All requests for approval to accept non-exempt wastes PROVE the material is not-hazardous and the Generato listing or testing will be approved. All transporters must certify the wastes delivered are only the SRIEF DESCRIPTION OF MATERIAL: The following MSDS sheets are for the UMC Cargile #	must be accompanied by necessary chemical r's certification of origin. No waste classified hasse consigned for transport.
Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes PROVE the material is not-hazardous and the Generato listing or testing will be approved. All transporters must certify the wastes delivered are only the BRIEF DESCRIPTION OF MATERIAL:	must be accompanied by necessary chemical r's certification of origin. No waste classified hasse consigned for transport.

DATE__04/14/98 TTTLE: Environmental Compliance Manager SIGNATURÉ Waste Management FacilityActhorised Agent TELEPHONE NO. (505)393-1079 Billie Charo TYPE OR PRINT NAME:

(This space for State Use) APPROVED BY

Estimated Volume 3000 bbis

TITLE Suthers dogunisa

Known Volume (to be entered by the operator at the end of the haul)

District I - (505) 393-6161
CO. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
HTS. First
Artesia, NM 88210
District III - (505) 334-6178
HOOO Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico Energy Minerals and Natural Resources epartment Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

(505) 827-7131

Form C-13 Originated 8/8/

Submit Origin
Plus 1 Co
to approprin
District Off

REQUEST FOR APPRO	VAL TO ACCEPT SOLID WASTE
1. RCRA Exempt: Non-Exempt: X	4. Generator UMC
Verbal Approval Received: Yes N	o 5. Originating Site Cargile # 1
2. Management Facility Destination Controlled Recover	ry, Inc. 6. Transporter Sonny's
3. Address of Facility Operator P.O. Box 369 Hobb	8. State New Mexico
7. Location of Material (Street Address or ULSTR) Le	a County UMC Cargile # 1
Generator; one certificate per job. B. All requests for approval to accept non-exemp	npt wastes will be accompanied by a certification of waste from the t wastes must be accompanied by necessary chemical analysis to Generator's certification of origin. No waste classified hazardous by only those consigned for transport.
BRIEF DESCRIPTION OF MATERIAL: The following MSDS sheets are for the UMC Countries being mixed for well control.	argile # 1. The material was generated by drilling mud
04-010	
Estimated Volume 3000 bbls cy Known Volume	(to be entered by the operator at the end of the haul) ————————————————————————————————————
SIGNATURE: Waste Management Facility Authorized Agent TYPE OR PRINT NAME: Billie Charo	TTTLE: Environmental Compliance Manager DATE: 04/14/98 TELEPHONE NO. (505)393-1079
(This space for State Use)	
APPROVED BY: APPROVED BY:	TITLE: DATE: 4/14/98 DATE: 4/14/98

Baroid Drilling Fluids, Inc. Environmental, Safety and Transportation Data Sheet

BAROID*

HEALTH HAZARD FLAMABILITY REACTIVITY Ratings based on NFPA
'Standard system for the Identification of the Fire Hazards of Materials' PRODUCT IDENTIFICATION Regular Telephone No. 281/871-5900 Emergency Telephone No. 800 424-9300 Supplier BARUID DRILLING FLUIDS, INC. Address P.O. BOX 1675 HOUSTON, TEXAS 77251 Trade Name BAROID Generic Description
BARITE, BARIUM SULFATE, BARYTES CAS #7727-43-7 II. HAZARDOUS INGREDIENTS Hazard Data Material or Componiat SILICA 14808-60-2-6 CRYSTALLINE SILICA (SIUE)
IN THE FORM OF QUARTZ,
CRISTOBALITE, AND TRIDYMITE
MAY BE PRESENT
(SEE SECTION V) III. PHYSICAL DATA

Boiling Point (Dey F) Melting Point 2901 F Freezing Point N\1 Specific Gravity (Water = 1) Vapor Pressure (nm Hg) 4. 5 NFI Vapor Density (Air = 1) Solubility in water, % by wt. NΑ LOW Evaporation Rate (Butyl Acetate = 1) _ NA Volatiles, % by Volume NA Appearance and Odor WHITE TO GRAY TO TAN POWDER, ODORLESS Density @ 20 Deg C 4.5 @ 15 C Ha

NA = Not Applicable ND = Not Determined
All information recommendations and suggestions herein concerning our product
are based upon tests and data believed to be reliable, however, it is the
user's responsibility to determine the safety, toxicity, and suitability for
his own use of the product described herein. Bince the actual use by others
is beyond our control, no guarantee, expressed or implied, is made by Baroid
Drilling Fluids, Inc. as to the effects of such use, the results to be
obtained, or the safety and toxicity of the product nor does Baroid Drilling
Fluids, Inc. assume and liability arising out of use, by others, of the
product referred to have in. Nor is the information herein to be construed
as absolutely complete since additional information may be necessary or
desirable when particular or exceptional conditions or circumstances exist
or because of applicable laws or government regulations.

(R) BAROID* is a Registered Trademark of Baroid Technology, Inc.



BAROID*

Paye &

IV. FIRE AND EXPLOSION DATA

THIS PRODUCT IS NOT FLAMMABLE OR EXPLOSIVE. EXTINGUISHING MEDIA: USE MEDIA APPLICABLE TO SURROUNDING FIRE.

HEALTH HAZARD INFORMATION

Carcinogenicity -SEE ROUTES OF EXPOSURE AND EFFECTS (DELOW)

Acute Oral (LD50)

Acute Dermal (LDS0)

Aquatic Toxicity (LC50)

Routes of exposure and effects
THIS PRODUCT CONTAINS FREE CRYSTALLINE SILICA WHICH ACCORDING TO THE CARC
HAS EXHIBITED LIMITED EVIDENCE OF CARCINOGENICITY IN HUMANS. PROLONG D
INHALATION OF DUST MAY RESULT IN SILICOSIS, A NONCANCEROUS LUNG DISEA E.
OSHA FINAL LIMITS TABLE 2-3 MINERAL DUSTS.

SILICA: CRYSTALLINE QUARTZ (RESPIRABLE)

10 mg/m3

75iQ2 + 2

QUARTZ (TOTAL DUST)

30 mg/m3

%SiO2 + 2

IF CRISTOBALITE OR TRIDYMITE IS DETECTED, USE ONE HALF THE VALUE CALCULATED FROM FORMULAE FOR QUARTZ.

IRRITANT POTENTIAL IRRIFANT

Emergency and First Aid procedures

EYE: IRRIGATE IMMEDIATELY WITH WATER. IF IRRITATION PERSISTS, CONTACT PHYSICIAN. FLUSH SKIN WITH WATER. SWALLOW: GIVE WATER AND INDUCE YUMITING. IF INHALED IN LARGE AMOUNTS MOVE TO FRESH AIR.

BAROLD*

Page 3

VI. REACTIVITY DATA

Conditions contributing to instability STABLE

Incompatibility NONE

Hazardous Decomposition Products NONE

Conditions Contributing to Hazardous Polymerization WILL NOT OCCUR.

VII. SPILL OR LEAK PROCEDURES

Steps to be taken if material is released or spilled NORMAL HOUSEKEEPING. SWEEP UP AND SALVAGE. CAUSES SLIFFERY SURFACES WHEN WET.

Neutralizing Chemicals

Waste Disposal Method DISPOSE OF IN ACCORDANCE WITH ALL LOCAL, STATE, AND FEDERAL REGULATIONS

VIII. INDUSTRIAL HYGIENE CONTROL MEASURES

Ventilation Requirements

MECHANICAL, GENERAL ROOM VENTILATION.

USE LOCAL VENTILATION TO MAINTAIN TLV (SEE SECTION V).

Specific Personal Protective Equipment
Respiratory
USE NIOSH APPROVED MECH. FILTER RESPIRATOR
EYE
GOGGLES
Gloves
WORKING GLOVES
Other Clothing and Equipment
APRON, EYEWASH STATILN

BARC D#

Page 4

IX. SPECIAL PRECAL FIONS

Precautionary Statements

DO NOT INGEST. AVOID INHALATION AND PROLONGED SKIN CONTACT. RECOMMENDED LABELING: FRONT PANIL: CAUTION SEE BACK PANEL FOR CAUTION SEFORE USE. BACK PANEL: CAUTION! THIS PRODUCT CONTAINS FREE CONSTALLINE SILICA WHICH ACCORDING TO THE IARC HAS EXHIBITED LIMITED EVIDENCE OF CARCINOGENICITY IN HUMANS. PROLONGED INHALATION OF THE POWDER MAY RESULT IN SILICOSIS, A NONCANCEROUS LUNG DISEASE. AVOID CREATING DUSTY CONDITIONS AND USE A NICSH APPROVED DUST RESPIRATOR.

Other Handling and Storage Requirements
STORE IN SHELTERED AREA OR COVER FOR MOISTURE PROTECTION.

X. DEPARTMENT OF TRANSPORTATION INFORMATION

Froper Shipping Name: NOT REGULATED AS HAZARDOUS

Hazard Class: NOT HAZARDOUS Hazardous Substance: NONE Label: NONE REQUIRED Placards: NONE Reportable quantity: NONE ID Number: NONE



BAROID*

Page 5

XI. REGULATORY INFORMATION

STATUS ON SUBSTANCE LISTS

Comprehensive Environmental Response, Compensation and Liability Act of 1980, (CERCLA) requires notification of the National Response Lenter of release of quantities of Hazardous Substances equal to or greater than the reportable quantities (RQs) in 40 CFR 302.4.

Components present in this product which may require notification are: Chemical CAS #

NONE

Superfund Amendments and Reauthorization Act of 1986 Title III requires emergency planning based on Threshold Planning Quantities (TPQs) and release reporting based on RQs.

Components present in this product at a level which could require reporting under the statute are:

NONE

SARA requires the submission of annual reports of toxic chemicals that appear in 40 CFR 372 (for SARA 313). This information must be included in all MSDS that are copied and distributed for this material.

Components present in this product at a level which could require reporting under the statute are:

NONE

Toxic Substances Control Act (TSCA)

The ingredients of this product are on the TSCA inventory.

Prepared By: Baroid Drilling Fluids, Inc. Environmental Services

Date: 03/26/97



BARUID*

Page 6

XII. STATE RIGHT-TO-KNOW

QUARTZ IS ON CANADIAN WHMIS (WORKPLACE HAZARDOUS MATERIAL INFORMATION SYSTEM) INGREDIENT DISCLOUSRE LIST, MASSACHUSETTS SUBSTANCE LIST, NEW JERSEY RIGHT TO KNOW HAZARDOUS SUBSTANCE LIST AND PENNSYLVANIA HAZARDOUS SUBSTANCE LIST AND PENNSYLVANIA HAZARDOUS SUBSTANCE LIST.



Baroid Drilling Fluids. Inc. Environmental, Safety and Transportation Data Sheet

SALT GEL

FLAMABILITY HEALTH HAZARD REACTIVITY Ratings based on NFPA
Standard system for the Identification of the Fire Hazards of Materials PRODUCT IDEN IFICATION Regular Telephone No. 281/871-5900 Emergency Telephone No. 800 424-9300 Supplier BARDID DRILLING FLUIDS, INC. P.O. BOX 1675 HOUSTON, TX 77251 Trade Name SALT GELT Generic Description ATTAPULGITE CLAY, MAGNESIUM ALUMINUM SILICATE II. HAZARDOUS INGREDIENTS Hazard Data
LOW CONCENTRATIONS OF
CRYSTALLINE SILICA (SiO2)
IN THE FORM OF QUARTZ,
CRISTOBALITE AND TRIDYMITMAY BE PRESENT Material or Component SILICA 14808-60-7 2-6 AND TRIDYMITE (SEE SECTION V)

III. PHYSICAL DATA

Melting Point ND Freezing Point NA Bailing Point (Deg F) NA Vapor Pressure (mm Hg) Specific Gravity (Water = 1) Vapor Density (Air = 1) Solubility in water, × by wt. NÃ NA Volatiles, % by Volume NONE Evaporation Rate (Butyl Acetate = 1) ND OFF WHITE POWDER, NO ODOR Density @ 20 Deg C PΗ

ND

NA = Not Applicable ND = Not Determined

All information recommendations and suggestions herein concerning our product are based upon tests and data believed to be reliable, however, it is the user's responsibility to determine the safety, toxicity, and suitability for his own use of the product described herein. Since the actual use by others is beyond our control, no guarantee, expressed or implied, is made by Baroid Drilling Fluids, Inc. as to the effects of such use, the results to be obtained, or the safety and toxicity of the product nor does Baroid Drilling Fluids, Inc. assume any liability arising out of use, by others, of the product referred to herein. Nor is the information herein to be construed as absolutely complete since additional information may be necessary or desirable when particular or exceptional conditions or circumstances exist or because of applicable laws or government regulations.



SALT GEL

Page 2

IV. FIRE AND EXPLOSION DATA

NO FIRE OR EXPLOSION HAZARD. SALT GEL WILL NOT SUPPORT COMBUSTION. FIRE EXTINGUISHING MEDIA: WATER SPECIAL FIRE FIGHTING PROCEDURES: NONE

V. HEALTH HAZARD INFORMATION

Carcinogenicity -SEE ROUTES OF EXPOSURE AND EFFECTS (BELOW)

Acute Oral (LD50)

Acute Dermal (LD50)

Aquatic Toxicity (LC50)

Routes of exposure and effects
THIS PRODUCT CONTAINS FREE CRYSTALLINE SILICA WHICH ACCORDING TO THE IARC
HAS EXHIBITED LIMITED EVIDENCE OF CARCINOGENICITY IN HUMANS. NUISANCE DUST
TLV=10mg/m3. OSHA PEL: CLASSIFIED AS NUISANCE DUST WHEN LESS THAN 1%
CRYSTALLINE SILICA IS PRESENT, IF GREATER THAN 1% CRYSTALLINE SILICA, THEN
EXPOSURES SHALL NOT EXCEED AN 8-HOUR TIME WEIGHTED AVERAGE LIMIT AS STATED
IN 29 CFR 1910.1000 TABLE Z-1-A FOR AIR CONTAMINANTS, SPECIFICALLY; SILICA;
CRYSTALLINE QUARTZ (RESPIRABLE) 0.1 mg/m3.

IRRITANT TO EYES, NOSE, THROAT AND LUNGS.

Emergency and First Aid procedures RINSE ALL CONTACTED AREAS AFTER USE.



SALT GEL

Page 3

VI. REACTIVITY DATA

Conditions contributing to instability STABLE

Incompatibility NONE

Hazardous Decomposition Products NONE

Conditions Contributing to Hazardous Polymerization WILL NOT OCCUR

VII. SPILL OR LEAK PROCEDURES

Steps to be taken if material is released or spilled pusty CONDITION. VACUUM UP, SALVAGE USEABLE MATERIAL. AVOID CREATING DUSTY CONDITION.

Neutralizing Chemicals NA

Waste Disposal Method DISPOSE OF IN ACCORDANCE WITH ALL LOCAL, STATE, AND FEDERAL REGULATIONS.

VIII. INDUSTRIAL HYGIENE CONTROL MEASURES

Ventilation Requirements
MECHANICAL, GENERAL ROOM VENTILATION. USE LOCAL VENTILATION TO MAINTAIN
TLV (SEE SECTION V)

Specific Personal Protective Equipment
Respiratory
USE A NIOSH APPROVED MECHANICAL FILTER RESPIRATOR FOR MONTOXIC DUSTS.
Eye
GOGGLES
Gloves
WORK GLOVES
Other Clothing and Equipment
EYEWASH STATION, APRON



SALT JEL

Page 4

IX. SPECIAL PRECAUTIONS

Precautionary Statements
AVOID PROLONGED INHALATION. RECOMMENDED LABELING: FRONT PANEL - CAUTION
SEE BACK PANEL FOR CAUTION BEFORE USE, BACK PANEL - CAUTION! THIS PRODUCT
CONTAINS FREE CRYSTALLINE SILICA WHICH ACCORDING TO THE IARC HAS EXHIBITED
LIMITED EVIDENCE OF CARCINOGENICITY IN HUMANS. PROLONGED INHALATION OF THE
POWDER MAY RESULT IN SILICOSIS. A NONCANCEROUS LUNG DISEASE. AVOID
CREATING DUSTY CONDITIONS AND USE A NIOSH APPROVED DUST RESPIRATOR.

Other Handling and Storage Requirements STORE IN SHELTERED AREA OR COVER FOR MOISTURE PROTECTION.

X. DEPARTMENT OF TRANSPORTATION INFORMATION

Proper Shipping Name: NOT REGULATED

Hazard Class: NONE Hazardous Substance: NONE Label: NONE Placards: NONE Reportable quantity: NONE ID Number: NONE



SALT UEL

Page 5

XI. REGULATORY INFORMATION

STATUS ON SUBSTANCE LISTS

Comprehensive Environmental Response, Compensation and Liability Act of 1980, (CERCLA) requires notification of the National Response Center of release of quantities of Hazardous Substances equal to or greater than the reportable quantities (RQs) in 40 CFR 302.4.

Components present in this product which may require notification are: Chemical CAS #

NONE

Superfund Amendments and Reauthorization Act of 1986 Title Ill requires emergency planning based on Threshold Planning Quantities (TPQs) and release reporting based on RQs.

Components present in this product at a level which could require reporting under the statute are:

NONE

SARA requires the submission of annual reports of toxic chemicals that appear in 40 CFR 372 (for SARA 313). This information must be included in all MSDS that are copied and distributed for this material.

Components present in this product at a level which could require reporting under the statute are:

NONE

Toxic Substances Control Act (TSCA)

The ingredients of this product are on the TSCA inventory.

Prepared By: Baroid Drilling Fluids, Inc. Environmental Services Date: 03/26/97

A. Project

HLK 12 JAR RA: 20HW RHKOTD FOATURION

۲.12/12

BEST Sheet

SALT GEL

Page 6

XII. STATE RIGHT-TO-KNOW

QUARTZ IS ON CANADIAN WHMIS (WORKPLACE HAZARDOUS MATERIAL INFORMATION SYSTEM) INGREDIENT DISCLOSUR ELIST, MASSACHUSETTS SUBSTANCE LIST, NEW JERSEY RIGHT TO KNOW HAZARDOUS SUBSTANCE LIST AND PENNSYLVANIA HAZARDOUS SUBSTANCE LIST.

UMC Petroleum Corporation

April 16, 1998

Mr. Wayne Price New Mexico, Energy, Minerals & Natural Resources Department Oil Conservation Division 1000 West Broadway Hobbs, New Mexico 88240

RE:

Carlisle State Com #1
Site Assessment Work Plan

Dear Mr. Price;

UMC Petroleum Corporation grants Calloway Safety Equipment Company, Inc., their personnel and or representatives, full authority to submit and administer any and all legal or procedural documentation on behalf of UMC Petroleum Corporation in the remedial effort of the Carlisle State Com #1 well and location. Calloway Safety Equipment Company recently submitted a Preliminary Site Assessment Work Plan to your office for consideration and approval on our behalf. UMC is in full agreement with the stipulations and information contained in the work plan.

We are awalting your approval of the plan to begin working on the remedial project as soon as possible. If you have any questions or need additional information, I can be reached in Denver at (303) 573-4721. Thank you for your time and help in this matter.

Sincerely,

Scott M. Webb

Regulatory Coordinator

CC: Calloway Equipment Company, Inc.



UMC PETROLEUM CORPORATION, DENVER DIVISION

410 17TH STREET, SUITE 1400 DENVER, COLORADO 80202 (303) 573-5100 FAX (303) 572-3034

FAX

Pages (2 including cover)

Date:

4/16/98

Tos

Wayne Price/NMO&GCC

(505) 393-0720

From:

Scott Webb / Operations Department (303) 573-4721 FAX (303) 534-8918

Message:

Carlisle State Com #1

Wayne,

Here is the authorization letter for Calloway to act on our behalf while working on the well clean-up. I have FED-Xed the original overnight to you. We are not planning to reuse the original drilling reserve pits again. We will use them only in the event of an emergency. We are planning to use steel tanks for any circulating jobs performed on the well. I will be your primary UMC contact for this job, please do not hesitate to call me at (303) 573-4721 if you have any questions concerning the completion of the well.

Thanks,

Scott Webb



CALLAWAY SAFETY EQUIPMENT CO., INC.

3229 INDUSTRIAL DRIVE ••• HOBBS, NEW MEXICO 88240
TELEPHONE: (505) 392-2973 • FAX: (505) 392-4990 • E-MAIL: CALLSAFE@GTE.NET

April 15, 1998

Mr. Chris Williams
New Mexico Department of Energy, Mineral, and Natural Resources
Oil Conservation Division, Hobbs Field Office
P.O. Box 1980
1000 West Broadway
Hobbs, New Mexico 88240

Subject: Site Assessment Work Plan for the UMC Petroleum Corporation well: Carlisle State Com #1

Mr. Williams,

UMC has contracted with Callaway Safety Equipment Company, Inc. (CSE) to provide environmental services at the above referenced well location. Attached is the proposed Site Assessment Work Plan developed by CSE for UMC and is being submitted to you for review and approval. To establish baseline/background reference concentrations of Benzene, Toluene, Ethylbenzene, and Xylene (total), ground water analytical results and the request for analyses/chain of custody form from area water wells is attached.

Currently, down hole work at the well has been suspended for two weeks until equipment becomes available and will allow some excavation and sampling to be initiated and possibly minimize ground water contamination.

Your response may be directed to UMC or CSE. Please call either Sam Callaway or myself at 392-2973 if there are any questions. Thank you for your assistance.

Sincerely,

Pat McCasland

CSE SAFETY AND ENVIRONMENTAL DIRECTOR

CC:

WAYNE PRICE, NMOCD SCOTT WEBB, UMC DENVER District I - (505) 393-6161
P.O. Ext. 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 South First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

State of New Mexico

Ener Minerals and Natural Resources

Oil Conservation Division

partment

2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131 Form C- 141 | Originated 2/13/97

Submit 2 copies to Appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action			
OPERATOR Initial Report Final Repor			
Name UMC Petroleum Corp.	Contact Scott M. Webb		
Address 410 17 Th St., STE 1400	Telephone No. (303) 573-4721		
Facility Name Carlisle State Com #1	Facility Type Drilling Gds Well		
Surface Owner Jerry Carlisle Mineral Owner Muc Petroleum / Yates PET Lease No.			
LOCATION OF RELEASE			
	Feet from the East/West Line County 1980 West Led		
NATURE OF RELEASE CON Second Selder			
Type of Release Blow out open flow	FRELEASE con deuts of felday Volume of Release 100 port F-2,000,000 mcf/day 1100 BBLs. **		
Source of Release Box Drilling G-ds Well	Date and Hour of Occurrence 3/20/98 2: Am Sdm E		
Was Immediate Notice Given? exact Time not a vailable. No Not Required	If YES, To Whom?		
By Whom?	Date and Hour		
Was a Watercourse Reached? Yes No	If YES, Volume Impacting the Watercourse.		
If a Watercourse was Impacted, Describe Fully (Attach Additional Sheets If Necessary) # Berms In stalled around Location to Retain fly 1997 12829: Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets If Necessary) Well flowing un controlled.			
Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets If Necessary)			
S. Mora			
Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Necessary)			
Berns constructed with collection prisique			
Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Necessary) Berms constructed with collection pits, around well-fits, around well-fits, around with fixed. Aidmeter of 100's Affected Area (+-) 4 Acres.			
I hereby certify that the information given above is true and complete to the best of my know are required to report and/or file certain release notifications and perform corrective actions f a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of lia contamination that pose a threat to ground water, surface water, human health or the enviror operator of responsibibility for compliance with any other federal, state, or local laws and/or	releases which may endanger public health or the environment. The acceptance of polity should their operations have failed to adequately investigate and remediate ument. In addition, NMOCD acceptance of a C-141 report does not relieve the		
Signature: Att - W.	OIL CONSERVATION DIVISION		
Printed Name: Scott M. Webb	Approved by District Supervisor:		
Tide: Regulatory Loov dinator	Approval Date: Expiration Date:		
Date: 3/26/98 Phone: (303) 573-4721	Conditions of Approval: Attached		

116.A. NOTIFICATION

- (1) The Division shall be notified of any unauthorized release occurring during the drilling, producing, storing, disposing, injecting, transporting, servicing or processing of crude oil, natural gases, produced water, condensate or oil field waste including Regulated NORM, or other oil field related chemicals, contaminants or mixture thereof, in the State of New Mexico
- (2) The Division shall be notified in accordance with this Rule with respect to any release from any facility of oil or other water contaminant, in such quantity as may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3-15-97]
- 116.B. REPORTING REQUIREMENTS: Notification of the above releases shall be made by the person operating or controlling either the release or the location of the release in accordance with the following requirements: [5-22-73...2-1-96; A, 3-15-97]
- (1) A Major Release shall be reported by giving both immediate verbal notice and timely written notice pursuant to Paragraphs C(1) and C(2) of this Rule. A Major Release is:
 - (a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;
 - (b) an unauthorized release of any volume which:
 - (i) results in a fire;

in accordance with the requirements of this Rule. [1-1-50...2-1-96; A, 3-15-97]

- (ii) will reach a water course;
- (iii) may with reasonable probability endanger public health; or
- (iv) results in substantial damage to property or the environment;
- (c) an unauthorized release of natural gases in excess of 500 mcf; or
- (d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3/15/97]
- (2) A Minor Release shall be reported by giving timely written notice pursuant to Paragraph C(2) of this Rule. A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels; or greater than 50 mcf but less than 500 mcf of natural gases. [3-15-97]

116.C. CONTENTS OF NOTIFICATION

- (1) Immediate verbal notification required pursuant to Paragraph B shall be reported within twenty-four (24) hours of discovery to the Division District Office for the area within which the release takes place. In addition, immediate verbal notification pursuant to Subparagraph B.(1).(d). shall be reported to the Division's Environmental Bureau Chief. This notification shall provide the information required on Division Form C-141. [5-22-73...2-1-96; A, 3-15-97]
- (2) Timely written notification is required to be reported pursuant to Paragraph B within fifteen (15) days to the Division District Office for the area within which the release takes place by completing and filing Division Form C-141. In addition, timely written notification required pursuant to Subparagraph B.(1).(d). shall also be reported to the Division's Environmental Bureau Chief within fifteen (15) days after the release is discovered. The written notification shall verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification. [5-22-73...2-1-96; A, 3-15-97]
- 116.D. CORRECTIVE ACTION: The responsible person must complete Division approved corrective action for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 (19 NMAC 15.A.19). [3-15-97]

P. O. Box 1980 Hobbs, NM 88241-1980 District II - (505) 748-1283 811 South First Artesia, NM 88210 District III - (505) 334-6178 1000 Rio Brazos Road Aztec, NM 87410 <u>District IV</u> - (505) 827-7131

DULL OF THE THEORY Energy Minerals and Natural Resources Department

Oil Conservation Divisio 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

Submit 2 copies to Appropriate District Office in accordance with Rule 116 on

LOUIN C- 141

Originated 2/13/97

back side of form

<u> </u>			
Release Notification and Corrective Action			
OPERATOR		Initial Report Final Report	
Name UMC Petroleum Corp.	C	n Webb	
Address 410 17 Th St., STE 1400	Telephone No. (303)	573-4721	
Facility Name Carlisle State Com #1	Pacility Type Drilling Cas Well		
Surface Owner Jerry Carlisle Mineral Owner UNIC Petro	lenm/ Yates Pet	Lease No.	
LOCATION OF RELEASE			
Unit Letter Section Township Range Feet from the North/South Line Feet from the East/West Line County 10 165 35 E . 1650 South 1980 West Led			
Type of Release NATURE OF RELEASE Con Long of Felday Volume of Release Volume of Release Volume Recovered			
Type of Release	Volume of Release / 00 BO	Volume Recovered	
Blow out open flow	t- 2,000,000 incf	day 1100 BBLS 7	
Source of Release GOS Drilling G-ds Well	Date and Hour of Occurrence $3/20/98$ 2. A h		
Was Immediate Notice Given? exact Time not division of the Not Required	If YES, To Whom?		
By Whom?	Date and Hour		
Was a Watercourse Reached?	If YES, Volume Impacting the V	Viterrourse	
Yes Vatercourse Reached? Yes No	if 123, volume impacting the v	gatiouse.	
If a Watercourse was Impacted, Describe Fully. (Attach Additional Sheets If Necessary) ** Berns Installed around Location to Retain flying.			
Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets If N Well flowing un controlled.		Rechobs Rechobs	
Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Necessary) Berns constructed with collection pits, around well			
Berons constructed with Aires (+ -) 4 Acres. Bidmeter of 100's Affected Aved (+ -) 4 Acres.			
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.			
Signature: Att n- UM-	OIL CONSERVATION DIVISION		
Printed Name: Scott M. Webb	Approved by District Supervisor:		
Title: Regulatory Loor dinator	Approval Date:	Expiration Date:	
Date: 3/26/98 Phone: (303) 573-4721	Conditions of Approval:	Attached	